

### **REMARKS**

Claims 1-14 have been examined. Claims 1, 3, 4, 7, 8, 10, 11 and 14 have been rejected under 35 U.S.C. § 102(b) and claims 2, 5, 6, 9, 12 and 13 have been rejected under 35 U.S.C. § 103(a).

#### **I. Preliminary Matter**

The Examiner maintains that the Information Disclosure Statement filed on July 15, 2004 fails to comply with 37 C.F.R. § 1.98(a)(3) because it does not include a concise explanation of relevance. However, as pointed out in the Information Disclosure Statement, the concise explanation requirement was satisfied by submitting a copy of the **International Search Report** along with an English-language version of those portions of the Search Report that indicated the degree of relevance found in the Search Report (i.e., Abschnitt = section; *Rechte* = right; *Spalte* = column; *Satz* = sentence) and by submitting an English translation of the relevant portions of the **German Office Action**. Applicant refers the Examiner to MPEP §609(III)(A)(3) in this regard. Applicant submits herewith a copy of a new Form PTO-SB/08 listing the references, and respectfully requests the Examiner to initial the documents. In addition, Applicant cites a U.S. patent publication listed on the International Search Report as an English-language counter part to one of the foreign language references previously submitted.

#### **II. Rejections under 35 U.S.C. § 102(b)**

The Examiner has rejected claims 1, 3, 4, 7, 8, 10, 11 and 14 under 35 U.S.C. § 102(b) as allegedly being anticipated by U.S. Patent No. 5,566,251 to Hanna et al. ("Hanna et al").

**A. Claim 1**

Applicant submits that claim 1 is patentable over the cited reference. For example, claim 1 recites that a computer unit is configured to compute position coordinates of the image information based on at least one of space coordinates of the camera, a zoom factor and a space vector. Further, the computer unit comprises a triggering unit configured to trigger at least one of the camera, the zoom device, and the device for three-dimensional orientation of the camera in accordance with at least one of the zoom factor and the space vector. The computer unit uses the zoom factor and the space vector directly for computing the position coordinates of the image information of a section of the environment.

The Examiner maintains that Hanna discloses the above features. However, Hanna merely discloses a pattern-key insertion technique that replaces a predetermined pattern present in a background scene with a substitute pattern present in a foreground scene (col. 4, lines 8-17). Thus, the computation of position coordinates in Hanna is performed by means of a pattern recognition type method. On the other hand, as set forth above, claim 1 recites that position coordinates of the image information are based on at least one of space coordinates of the camera, a zoom factor and a space vector.

In addition, the position coordinates are directly determined on the basis of the zoom factor and the space vector provided by the computer unit itself. Thus, in contrast to the teachings of Hanna, the application of pattern recognition is not required to compute the position coordinates. Further, Applicant submits that the claimed invention requires less computation power and is significantly easier than the pattern recognition.

In view of the above, Applicant respectfully requests the Examiner to reconsider and withdraw the rejection of claim 1.

**B. Claim 8**

Claim 8 recites a method where position coordinates of image information are computed based on at least one of space coordinates of a camera, a zoom factor and a space vector. By using a triggering unit, the computer unit triggers at least one of the camera, the zoom device, and the device for three-dimensional orientation of the camera in accordance with at least one of the zoom factor and the space vector. Further, the computer unit uses the zoom factor and the space vector directly for computing the position coordinates of the image information of the section of the environment. Accordingly, Applicant submits that claim 8 is patentable for at least analogous reasons as claim 1 set forth above.

**C. Claims 3, 4, 7, 10, 11 and 14**

Since claims 3, 4, 7, 10, 11 and 14 are dependent upon one of claims 1 or 8, Applicant submits that such claims are patentable at least by virtue of their dependency.

**III. Rejections under 35 U.S.C. § 103(a)**

The Examiner has rejected claims 2, 5, 6, 9, 12 and 13 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Hanna and U.S. Patent No. 5,479,205 to Silverbrook ("Silverbrook"). However, since claims 5, 6, 12 and 13 are dependent upon one of claims 1 or 8, and Silverbrook fails to cure the deficient teachings of Hanna in regard to claims 1 and 8, Applicant submits that such claims are patentable at least by virtue of their dependency. In

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addition, since claims 2 and 9 are canceled, without prejudice or disclaimer, and have been incorporated into claims 1 and 8, respectively, Applicant refers the Examiner to the comments presented above.

#### IV. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Since the initial response date fell on a Saturday, Sunday or holiday, the submission of this response on Monday, November 14, 2005, is considered timely without payment of an extension fee.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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